

UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

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IAN HUNTER LUCAS, : 3:24-cv-00440  
 :  
 *Plaintiff(s)*, :  
 :  
 v. : District Judge  
 : Waverly D. Crenshaw, Jr  
 :  
 : Magistrate Judge  
 : Jeffrey S. Frensey  
 VANDERBILT UNIVERSITY. :  
 :  
 *Defendant(s)*. :  
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**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE**  
**REMAINING SPECIFIC DEFENDANTS**

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Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiff, Ian Hunter Lucas, hereby gives notice of the voluntary dismissal, without prejudice, of the above-captioned action against the following below listed Defendants.

This notice is filed with the understanding that the dismissal is without prejudice to the right of the Plaintiff to refile the action against the Defendants named herein, if necessary and warranted by future circumstances as determined by the Plaintiff, under applicable law.

In accordance with this Voluntary Dismissal Without Prejudice, each party shall bear its own attorneys' fees, costs, and expenses related to this matter, unless the Defendant is found to be at significant fault for the initial dispute, in which case the Defendant shall bear both parties' fees, costs, and expenses. This provision is intended to

ensure that, notwithstanding the dismissal of the case pursuant to Federal Rule of Civil Procedure 41(a)(1), each party remains responsible for its own legal and related costs incurred up to the point of dismissal unless the aforementioned conditions are met.

***Protection Against Future Claims***

Upon the filing of this Notice of Voluntary Dismissal Without Prejudice, the Plaintiff, Ian Hunter Lucas, shall be shielded from any crossclaims, counterclaims, or any other legal actions initiated by any defendant named herein, arising out of the same facts and circumstances of the dismissed action. This protection remains in effect unless the plaintiff refiles the dismissed action against any of the named defendants, at which point such claims may be reasserted as appropriate under applicable law. This protection is provided pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, which governs the voluntary dismissal of actions by plaintiffs.

***List of Defendants***

This Notice of Voluntary Dismissal Without Prejudice is directed towards the following Defendants, each of whom is hereby expressly named and included within the scope of this Notice:

1. Daniel Diermeier
2. Tracey George
3. Cybele Raver
4. Melanie Lowe
5. Timothy Garrett
6. Maja A. Hartzell
7. Ernie Rushing
8. Sara Donahoe
9. Terry Walker
10. K. Melissa Smith Hayes
11. Nancy Wise
12. Lacey Cross
13. Monika Do
14. Carrie Plummer
15. Ellen Schoen
16. Judson Smith
17. Jessica Wellette

18. Melanie Morris
19. Robingale Panepinto
20. Melissa Lord
21. Brittany Kirby
22. Shannon Ellrich

***Jurisdiction***

Pursuant to the relevant provisions of the U.S. Federal Rules of Civil Procedure, this Notice of Voluntary Dismissal Without Prejudice is hereby submitted under the jurisdiction of the United States Federal Courts. This notice applies exclusively to the following defendants, while preserving the rights of the plaintiff, Ian Hunter Lucas, to initiate future actions concerning the same claims against any party not listed herein:

This action is taken without prejudice to the plaintiff, Ian Hunter Lucas, allowing for the possibility of future litigation on the same claims against the defendants named above or any other party.

***The only remaining defendant in this matter is “The Vanderbilt University,” and the service of process is pending.***

Respectfully Submitted, Dated this 25 day of June 2024.

**/s/ Ian H. Lucas**

Ian H. Lucas  
Plaintiff Pro Se  
221 Charleston Avenue  
Pleasant View, Tennessee, 37146  
Phone: (910) 872-3577  
Email: LucasIanHunter@outlook.com

*Plaintiff Pro Se*

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **NOTICE OF PLAINTIFFS VOLUNTARY DISMISSAL-Remaining Specific Defendants** was served by the Court's CM/ECF system, which forwarded a copy to the counsel of record for Defendants automatically.

## **SERVICE LIST**

Kevin C. Klein (#23301)  
Jeffrey W. Sheehan (#33534)  
KLEIN SOLOMON MILLS, PLLC  
1322 4th Avenue North  
Nashville, Tennessee 37208  
(615) 600-4780

*Attorney for Defendant Vanderbilt University  
and Daniel Diermeier, Tracey George, Cybele Raver, Melanie Lowe, Timothy Garrett, Maja A. Hartzell, Ernie Rushing,  
Sara Donahoe, Terry Walker, K. Melissa Smith Hayes, Nancy Wise, Lacey Cross, Monika Do, Carrie Plummer, Ellen  
Schoen, Judson Smith, Jessica Wellette, Melanie Morris, Robingale Panepinto, Melissa Lord, Brittany Kirby, Shannon  
Ellrich*

Dated this 25th day of June 2024.

Respectfully submitted, with all rights reserved by Ian Hunter Lucas

**/s/ Ian H. Lucas**

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Ian H. Lucas  
Plaintiff *Pro Se*  
221 Charleston Avenue  
Pleasant View, Tennessee, 37146  
Phone: (910) 872-3577  
Email: LucasIanHunter@outlook.com